Michael Thomas Margolis, M.D.

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               IN THE DISTRICT COURT
               53RD JUDICIAL DISTRICT
                TRAVIS COUNTY, TEXAS
JOSEPHINE MARIE RABIOLA,
            Plaintiff,
                              CAUSE NO.
vs.
                            ) D-1-GN-13-002039
TOMAS G. ANTONINI, M.D.,
LONE STAR UROGYNECOLOGY
AND CONTINENCE CENTER,
PLLC, SETON HEALTHCARE
FAMILY, SETON FAMILY OF
HOSPITALS, D/B/A/ SETON
MEDICAL CENTER, JOHNSON &
JOHNSON, and ETHICON,
INC.,
            Defendants.
            EXPERT WITNESS TESTIMONY OF
           MICHAEL THOMAS MARGOLIS, M.D.
     Held at the San Francisco Marriott Marquis
       780 Mission, San Francisco, California
          Sunday, July 26, 2015, 9:01 a.m.
REPORTED BY: ELAINA BULDA-JONES, CSR #11720
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     mesh from a TVT-S be removed?
 1
 2
          Α.
               No.
 3
               Impossible?
          0.
 4
          Α.
               Nothing is impossible. It is exceedingly
 5
     unlikely that anyone could remove the entire body of
     a TVT-S mesh, except if you pull it out within maybe
 6
     days of implantation.
 7
               And why do you say that?
 8
          0.
               Because the TVT mesh -- TVT-S mesh, as
 9
     with all the meshes, their job -- what they are
10
11
     designed to do is to set up an inflammatory
12
     reaction, which causes the immune system to attack,
13
     and then eventually causes scar tissue to come in
14
     and set it in place.
15
               That's the purpose of the mesh.
                                                 That's
16
     why it's -- it doesn't require stitches to hold it
17
     in place. That scar tissue sets it in place.
18
     That's what all of these meshes are designed to do.
19
               But the scar tissue, once it forms over
20
     the mesh -- again, it's like the old analogy I used
21
     before, rebar, it's set in place and it locks it
22
     into -- the fibrosis locks the mesh into place.
23
               Why was Dr. Antonini able to remove most
          0.
24
     of the mesh and didn't remove all of it?
25
          Α.
               He got, as I understand, four centimeters
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 1
     STATE OF CALIFORNIA
 2
     COUNTY OF YOLO
 3
            I, ELAINA BULDA-JONES, a Certified Shorthand
 4
     Reporter of the State of California, duly authorized
 5
     to administer oaths pursuant to Section 2025 of the
     California Code of Civil Procedure, do hereby
 6
     certify that
 7
 8
                MICHAEL THOMAS MARGOLIS, M.D.,
 9
     the witness in the foregoing deposition, was by me
10
     duly sworn to testify the truth, the whole truth and
11
    nothing but the truth in the within-entitled cause;
12
     that said testimony of said witness was reported by
     me, a disinterested person, and was thereafter
13
14
     transcribed under my direction into typewriting and
15
     is a true and correct transcription of said
16
    proceedings.
17
            I further certify that I am not of counsel or
18
     attorney for either or any of the parties in the
19
     foregoing deposition and caption named, nor in any
20
     way interested in the outcome of the cause named in
21
     said deposition dated the ____ day of
         _____, 2015.
22
23
24
25
     ELAINA BULDA-JONES, RPR, CSR 11720
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